

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the Commission's)	
Amateur Radio Service Rules to Eliminate)	RM - 10786
Morse Code Proficiency Testing Requirements)	
For All Classes of Amateur Licenses)	
)	
To: The Commission)	

Comments Of Linda G Ingram, KD5MOE

I believe that the technology and times have changed so much over the years that all of the previously used reasons for requiring Morse Code as a qualifier for amateur operators no longer exist. Technology has provided more effective emergency communication therefore the Morse skills are no longer required by amateur operators. Because virtually no government or commercial radio service uses Morse Telegraphy in today's business world there is no need to maintain a pool of Morse trained operators.

Other countries such as The Netherlands, Norway, The United Kingdom, Germany, Switzerland and Belgium have already eliminated Morse test requirements and many others are expected to follow in their footsteps. Even the IARU recognizes that continuing use of Morse proficiency requirements are not in the best interest of the future of the amateur radio service. This imposes a more unnecessary and burdensome task on those seeking a Commission-issued amateur radio license than those of equally qualified individuals in other countries.

As clearly demonstrated by the Commission's own determinations from the Proceedings in both 1990 and 1999, as referenced in the NCI petition, the Morse proficiency test requirement is unnecessary and undesirable. The requirement acts as a barrier to entry or advancement to otherwise qualified persons in amateur radio. It is not a reliable indicator of a person's ability to contribute to the advancement of the radio art, nor can it attest to the examinee's good character, high intelligence, cooperative demeanor, or willingness to comply with the Commission's rules. Likewise it no longer serves as a regulatory purpose, or as a public interest and necessity or as in agreement with the basis and purpose of the Amateur Radio Service.

The Commission has the authority to amend Part 97 rules to eliminate Morse proficiency requirement by expedited order and I encourage you to do so without formal notice or public input. By granting NCI's Petition, a burden on applicants for amateur radio licenses would be removed, no additional requirement would be imposed, and therefore no party or other person would be prejudiced by the Commission action. I believe this course of action would be a wise, correct and prudent decision on the Commission's part because of the following points. (1) The Commission is clearly within its authority to do so. (2) It would save considerable drain on the Commission's limited and valuable resources in dealing with a matter that the Commission has already considered extensively. (3) It would remove an unnecessary, restrictive burden that the Commission has already determined does not agree with the purpose of the Amateur Radio Service and serves no regulatory purpose.

I would also like to ask that the Commission refrain from combining NCI's request for the prompt elimination of Morse test requirement from its rules with other substantially unrelated issues as it would result in unnecessary delay in resolving this important and clear-cut issue.

In summary, for all the reasons outlined and referenced herein, the Commission should enact the following changes to its rules in the most expeditious manner possible: (1) Eliminate the “Element 1” Morse test totally from the Commission’s rules for all license classes. (2) Modify the privileges afforded to Technician class licenses to be equivalent to those currently extended it to Technician Plus licensees and Technician with Morse credit licensees.

Respectfully submitted,

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